

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO,

PROMESA
Title III

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,¹

No. 17 BK 3283-LTS
(Jointly Administered)

Debtors.

**INFORMATIVE MOTION OF THE QTCB NOTEHOLDER
GROUP REGARDING JULY 13-14, 2021 DISCLOSURE STATEMENT HEARING**

The QTCB Noteholder Group² hereby submits this informative motion pursuant to the Court's *Order Regarding Procedures for Disclosure Statement Hearing* (the "Order," Dkt. No. 17210), and respectfully states as follows:

1. Kurt A. Mayr and David L. Lawton of Morgan, Lewis & Bockius LLP will appear telephonically on behalf of the QTCB Noteholder Group at the July 13-14, 2021 Hearing³ to address, as necessary, the following matters:

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers listed as Bankruptcy Case numbers due to software limitations).

² The QTCB Noteholder Group has the same meaning as set forth in *Notice of Appearance and Request for Notice* (Dkt. No. 134, Case No. 17-3283 LTS) and *Ninth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* (Dkt. No. 16445, Case No. 17-3283).

- a. *Amended Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures* (the “Solicitation Procedures Motion,” Dkt. No. 16756);
- b. *Motion of the Debtors for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (the “Confirmation Procedures Motion,” Dkt. No. 16757, collectively with the Solicitation Procedures Motion, the “Motions”); and
- c. Any objections, responses, statements, joinders or replies related to the Motions.

2. The QTCB Noteholder Group further reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of the QTCB Noteholder Group.

WHEREFORE, the QTCB Noteholder Group respectfully requests that the Court take notice of the foregoing.

[Remainder of page intentionally left blank]

³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Order.

RESPECTFULLY SUBMITTED,

Dated: July 7, 2021
San Juan, Puerto Rico

Morgan, Lewis & Bockius LLP

/s/ Kurt A. Mayr

Kurt A. Mayr (*pro hac vice*)
David L. Lawton (*pro hac vice*)
Shannon B. Wolf (*pro hac vice*)
One State Street
Hartford, CT 06103-3178
Tel. (860) 240-2700
Fax: (860) 240-2701
kurt.mayr@morganlewis.com
david.lawton@morganlewis.com
shannon.wolf@morganlewis.com

Sabin Willett (*pro hac vice*)
One Federal Street
Boston, MA 02110-1726
Tel: (617) 951-8775
sabin.willett@morganlewis.com

Correa-Acevedo & Abesada Law Offices, PSC

/s/ Sergio Criado

Sergio Criado
USDC-PR No. 226307
Roberto Abesada-Aguet
USDC-PR No. 216706
Centro Internacional de Mercadeo, Torre II
90 Carr. 165, Suite 407
Guaynabo, P.R. 00968
Tel. (787) 273-8300
Fax (787) 273-8379
ra@calopsc.com
scriado@calopsc.com

Co-Counsel for the QTCB Noteholder Group

I HEREBY CERTIFY that on July 7, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notifications of such filing to all attorneys of record.

**CORREA ACEVEDO & ABESADA
LAW OFFICES, P.S.C.**

/s/ Sergio Criado

Sergio Criado

USDC-PR No. 226307

E-Mail: scriado@calopsc.com

Centro Internacional de Mercadeo, Torre II

90 Carr. 165, Suite 407

Guaynabo, P.R. 00968

Tel. (787) 273-8300; Fax (787) 273-8379